

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN CLERK'S OFFICE  
U.S.D.C. Atlanta

APR 23 2007

JAMES HATTEN, Clerk  
By: [Signature] Deputy Clerk

Veronica F. Brown  
Plaintiff:

vs.

Northside Hospital  
Defendant :

1:07-cv-0905

COMPLAINT  
TITLE VII COMPLAINT

WSD

1. Plaintiff resides at: 2824 Peyton Crossing Drive, Atlanta, Georgia 30311
2. Defendant(s) names (s): Northside Hospital Human Resources Department

Location of principal office(s) of the named defendant(s) 1000 Johnson Ferry Road,  
Atlanta, Georgia 30342

Nature of defendant(s) business Health Care

Approximate number of individuals employed by defendant(s) 6500

\*Note: This is a form complaint provided by the Court for pro se litigants who wish to file an employment discrimination lawsuit. It is not intended to be used for other kinds of cases.

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. § 2000e-5. Equitable and other relief are also brought under 42 U.S.C. §e-5(g).
1. The acts complained of this suit concern:
  - A. \_\_\_\_\_ Failure to employ me.
  - B. \_\_\_\_\_ Termination of my employment.
  - C. \_\_\_\_\_ Failure to promote me.
  - D. X Other (Specify) Terminated due to age

5. Plaintiff:

A. \_\_\_\_\_ presently employed by the defendant.

B. \_\_\_\_\_ not presently employed by the defendant. The dates of plaintiff's employment were 3/25/1976 - 6/30/2006.

The reasons plaintiff was given for termination of employment is/are:

(1)   X   plaintiff was discharged.

(2) \_\_\_\_\_ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left the job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

A. \_\_\_\_\_ my race

B. \_\_\_\_\_ my religion.

C. \_\_\_\_\_ my sex.

D. \_\_\_\_\_ my national origin.

E.   X   Other (specify) Age

7. The name(s), race, sex and the position or title of the individual(s) who alleged y discriminated against me during the period of my employment with the defendant company is/are:

Renee Ruffin, Benefits Supervisor age 36

8. Describe the discriminatory actions or events you are complaining of in this lawsuit. Give factual detail, including names and dates concerning what happened. You do not need to refer to any statutes or cite law.

I had being employed by Northside Hospital for 29 years and had done quite well (my evaluations support this) until June, 2005 when Renee Ruffin was hired as my supervisor and I believe for the specific reason to replace the older staff members with younger ones. Ms. Ruffin made it clear in several team meetings that she had been given this power to remove anyone who did not belong. I believed her statement because of what was happening in other departments throughout Northside; many older employees being forced from employment just before age 55 to prevent them from continuing health care post retirement and defuse the totally employer funded larger pension payouts. I knew this first hand because the Human Resources departmental meetings discussions of 2004 and 2005, and my position as a Retirement Specialist. After two weeks of employment Ms. Ruffin started harassing and bullying me in front of my peers (telling me to shut-up loudly and forcefully after being asked a question by her and giving a correct answer to what was asked), but never management. Ms. Ruffin behavior never ceased knowing that she had approval of management and administration. She would ignore me or any questions and contributions I had to offer to the team. She would invent stories to make it appear that I was making it difficult for her. Management informed me that I would have to make things work with Ms. Ruffin. I asked Ms. Ruffin

what were her expectations of me, she never answered. I then shared with management. The environment became so hostile that it began affecting my health. I would bring my blood pressure cuff to work for personal monitoring and shared my elevated readings with my manager. My manager tested the cuff for accuracy and knew that my readings were true. On November 15, 2005 after another hostile encounter with Ms. Ruffin, I was taken to the emergency room at Northside Hospital with an alarming high blood pressure reading and severe head ache thinking that I was having a stroke or heart failure. I was given a Head CT, medication to lower my blood pressure and four hours of monitoring. The next week after my emergency room visit, my manager asked why did I feel that Ms. Ruffin did not like me. My answer was due to my age and knowledge of the Pension Department. Management never came to my defense after reports from myself, and many staff members regarding Ms. Ruffins behavior of harassment and bullying. I went out on a medical/surgical leave 1/18/2006. Ms. Ruffin informed me before I left that things would be different when I returned. I worked from home while I was out on leave. I communicated with my manager and supervisor by phone and email. Ms. Ruffin never responded to any of the emails or voice messages. When I returned to work on 2/16/2006, Ms Ruffin started harassing me, stating that we had a communication problem. My body was still in the recovery process and the attacks had resumed, I felt that the behavior was never going to change and for health reasons I had to do something. I had never intended to leave Human Resources, but was seeking refuge in another area of the department. I asked my manager for a transfer and he told me that I was being fired instead. I was charged falsely with 8 allegations, which I proved to be just that. This information to prove that the allegations were all lies, with supported documentation was given to my manager. I was told on 3/31/2006 to pack up my office and hand over my keys. I share with the Hospital Administrator that I was being forced out due to my age. I was then relocated to Northside Forsyth while an age discrimination independent investigation was done. I never viewed the findings, but was told nothing was found to support my case. I found out on 5/31/2006 (at my termination meeting with my Human Resources and Grievance Managers in attendance) that my manager (the same manager who informed me when first employed that he was used to working with younger women) had withheld this information from Management and Administration. I asked why I was being fired since I had proven all allegations charged were false. The grievance manager did not know that I had even responded to the charges. I asked if it was not a performance issue then what was it. She stated that I refused to be supervised. I told the two attendees (managers) that I could not prevent anyone from lying on me. I asked if she or anyone witness this behavior, me not wanting to be supervised? I asked if they had ever known me to lie to anyone? The answer was no. The Grievance Manager last words that I can remember were "It has been decided that you was not right for the department". Three weeks after been forced from the Northside Atlanta Campus, my position was filled by my supervisor's friend and 3 times co-worker, who is twenty years younger and who was also given higher pay.

9. The alleged illegal activity took place at Northside Hospital of Atlanta

10. A. X I have filed a charge with the Equal Employment Opportunity

Commission regarding defendant(s). (I have attached a copy of my charge(s) filed with the Equal Employment Opportunity Commission, which are incorporated into this complaint.

B. \_\_\_\_\_ I have not filed a charge.

11. A. X I received a Notice of Right-to-Sue letter from the Equal Employment Opportunity Commission on 1/25/2007 (date). (I have attached a copy of the Notice of Right-to-Sue which is incorporated into this complaint.)

B. \_\_\_\_\_ I have not received a Notice of Right-to-Sue letter from the Equal Employment Opportunity Commission.

- ALSO SEE AGE DISCRIMINATION STATEMENT (attached)*
12. State what relief you are seeking from the Court. If you are seeking a monetary award (back pay or damages), state the amount you are seeking. If you are seeking injunctive relief (an order by the Court) issued against the defendant(s) summarize what should be in the order.

(1) I would like all previous benefits restored until age 65 (health care-medical/dental/vision /life coverage/accidental death & dismemberment) including bi-weekly wages and back pay.

Pension yearly contribution restored until age 65

The 30 years of employment gift not received).

(2) \$2,000,000.00 for the attack on my life and damages suffered

4/23/2007  
Date

  
Signature of Plaintiff

Address: 2824 Peyton Crossing  
Drive, Atlanta, Georgia 30311

Telephone: 404-752-7714

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Veronica F. Brown  
2824 Payton Crossing Drive, Sw  
Atlanta, GA 30311

From: Atlanta District Office - 410  
100 Alabama Street, S.W.  
Suite 4R30  
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

410-2006-01445

Deborah J. Lichten,  
Investigator

(404) 582-6848

(See also the additional information enclosed with this form.)

## NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA): This is your Notice of Right to Sue, issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:



The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.



The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Bernice Williams-Kimbrough,  
Director

JAN 25 2007

(Date Mailed)

Enclosures(s)

cc: Bridget L. Green  
Human Resource Director  
NORTHSIDE HOSPITAL ATL  
1000 Johnson Ferry Road  
Atlanta, GA 30342

## CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA  
☒ EEOC

410-2006-01445

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Veronica F. Brown

Home Phone (Incl. Area Code)

(704) 752-7774

Date of Birth

04-09-1952

Street Address

2824 Peyton Crossing Drive, S. W.

City, State and ZIP Code

Atlanta, GA 30311

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

NORTHSIDE HOSPITAL OF ATLANTA

No. Employees, Members

500 or More

Phone No. (Include Area Code)

(404) 951-8393

Street Address

1000 Johnson Ferry Road

City, State and ZIP Code

Atlanta, GA 30342

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☐ RETALIATION ☒ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

02-20-2005

03-31-2006

☐ CO-EXISTING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was hired by the above employer on March 25, 1976. I am currently employed until April 23, 2006. After months of bullying, verbal abuse and humiliation in front of my peers and often being told to shut-up by Renee Ruffin, Benefit Supervisor, I asked for a transfer on February 20, 2006. On February 28, 2006, I was told that I would be terminated from my Retirement Specialist position. On March 31, 2006, I was informed by Gregory Johnson, Human Resources Manager and Renee Ruffin to turn my keys in and clean up my office because I could not return to this office because they were sending me on a temporary assignment to Northside Forsyth (Georgia) until April 28, 2006 (my discharge date). I was replaced at the Hospital's Atlanta location by Pamela Batts (age 35) who is also being paid more.

Mr. Johnson, Ms. Ruffin and Teresa Dawson-Collier, Grievance Manager, informed me that I was being terminated due to performance issues.

I believe I have been discriminated against because of my age (54) in violation of the Age Discrimination in Employment Act of 1967, as amended.

RECEIVED

I want this charge filed with both the EEOC and the State or local Agency, if any. I w

NOTARY -- When necessary for State and Local Agency Requirements

Ill advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Apr 20, 2006

Date

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)



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**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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Veronica F. Brown  
Plaintiff

**vs.**

Northside Hospital  
Defendant

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:  
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:  
:  
:  
:

**Civil Action No.**

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**AGE DISCRIMINATION**

**Now comes the above plaintiff and shows the Court the following:**

1.

2824 Peyton Crossing Drive  
Atlanta, Georgia 30311

2.

1000 Johnson Ferry Road  
Atlanta, Georgia 30342

3.

Age Discrimination

4.

I was employed at Northside Hospital for thirty years, and worked as a Retirement Specialist in the Human Resources Department. Northside Hospital had begun replacing older workers who had been forced from employment by hostile managers and replaced with younger ones as early as 2004. This action was taken to insure that these employees did not reach age 55 as active employees, which would have allowed continued medical benefits and earn higher Pension payouts, which had become a strain on the budget since

this plan is solely employer funded. Ms Ruffin, the defendant became my supervisor in June/2005, knowing that I had health issues immediately begun harassing and bullying myself, and the older employees in the department who had not reached age 55. After returning from a surgical procedure, still in the recovery stage, my supervisor continued her vicious attacks. I asked for a transfer to get health relief. I was told that I was being fired instead. I was asked to leave the department and work at the Northside Forsyth facility until an investigation was done. Although I was still an active employee, I was replaced in the Human Resources Office three weeks later by my supervisor's friend and 3 times co-worker, who was twenty years younger than myself, and also received higher pay.

5.

I would like all benefits restored. I would like monetary compensation for punitive damages.

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Signature and date

2824 Peyton Crossing Drive  
Atlanta, Georgia 30311  
Address

404-752-7774  
Phone Number